

EXHIBIT C

1 I. NEEL CHATTERJEE (STATE BAR NO. 173985)
nchatterjee@orrick.com
2 MONTE M.F. COOPER (STATE BAR NO. 196746)
mcooper@orrick.com
3 THERESA A. SUTTON (STATE BAR NO. 211857)
tsutton@orrick.com
4 MORVARID METANAT (STATE BAR NO. 268228)
mmetanat@orrick.com
5 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
6 Menlo Park, CA 94025
Telephone: 650-614-7400
7 Facsimile: 650-614-7401

8 Attorneys for Plaintiff
FACEBOOK, INC.

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 FACEBOOK, INC.,

14 Plaintiff,

15 v.

16 POWER VENTURES, INC. a Cayman Island
17 Corporation; STEVE VACHANI, an
individual; DOE 1, d/b/a POWER.COM,
18 DOES 2-25, inclusive,

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No. 5:08-cv-05780 JW (JCS)

**FACEBOOK, INC.'S SECOND
SUPPLEMENTAL INITIAL
DISCLOSURES PURSUANT TO FED.
R. CIV. P. 26**

Plaintiff Facebook, Inc. provides the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Facebook makes these disclosures based on information currently known to Facebook following a good faith inquiry, without the benefit of full and complete discovery from any of the parties in this action, and without waiver of the attorney-client privilege or any other applicable privilege or doctrine. Facebook reserves the right to modify, amend, or otherwise supplement this disclosure, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, as additional information becomes available during the course of this action, and to rely on such information as evidence in this action. Facebook further reserves the right to object to production and/or introduction into evidence of any document within the categories described herein or any testimony of the witnesses identified herein on the basis of privilege, relevance, or otherwise as appropriate.

Rule 26(a)(1)(A)(i): the name and , if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Based on information currently available to Facebook, the following individuals are believed likely to have discoverable information, which Facebook may use to support its CAN-SPAM Act, Computer Fraud and Abuse Act, and California Penal Code Section 502, claims against Defendants.

| Individual | Contact Information | Subjects |
|---------------|---|---|
| Steve Vachani | 2425 B Channing Way Berkeley, CA 94704 Telephone Number Unknown | Information regarding Power's access to and use of the Facebook website, and all other issues in the case. |
| Eric Santos | Unknown | Information regarding Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, the creation of Power, investment in Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software |

| | | | |
|----|----------------|--|--|
| 1 | | | used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 2 | | | |
| 3 | Felipe Herrera | Unknown | Information regarding Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, the creation of Power, investment in Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| 9 | | | |
| 10 | | | |
| 11 | | | |
| 12 | Bruno Carvalho | Sei tecnologia (71) 3351-1904 | Information regarding Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 13 | | | |
| 14 | | | |
| 15 | | | |
| 16 | | | |
| 17 | | | |
| 18 | | | |
| 19 | Tyago Valenca | Unknown | Information regarding Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 20 | | | |
| 21 | | | |
| 22 | | | |
| 23 | | | |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | Carlos Bacelar | Hi-Midia - Grupo RBS Rua Bambina, 19 - Botafogo Rio de Janeiro, Brazil | Information regarding Power's access to and use of the Facebook website, including the number of accesses of |
| 28 | | | |

| | | | |
|---|-------------------|--|--|
| 1 | | CEP: 22251-050 (21) 2244.8888 | Facebook by Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 2 | Carolina Fialho | Unknown | Information regarding Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 3 | Juliane Conceicao | Solutis Tecnologias Rua Frederico Simões, 125 Ed. Liz Empresarial, 7º andar Caminho das Árvores – Salvador / BA CEP: 41820-774 Tel.: + 55 71 3021-2999 Fax: + 55 71 3021-2999 | Information regarding Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 4 | Elmo Cruz | Unknown | Information regarding Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |

| | | | |
|----|-----------------|---|--|
| 1 | | | Facebook Connect. |
| 2 | | | |
| 3 | Zak Mandhro | Shopon, LLC. 2225 Bayshore Road #200, Palo Alto, California, USA. (888) 448-8365 | Information regarding the management of Power and Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| 9 | | | |
| 10 | | | |
| 11 | Andre Fernandes | Unknown | Information regarding the management of Power and Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 12 | | | |
| 13 | | | |
| 14 | | | |
| 15 | | | |
| 16 | | | |
| 17 | | | |
| 18 | | | |
| 19 | | | |
| 20 | Danilo Delgado | Unknown | Information regarding Power's access to and use of the Facebook website, including the number of accesses of Facebook by Power, the creation of Power, investment in Power, Power's knowledge of Facebook's and other social network's Terms of Service, development of PowerScript, development of PowerBrowser, the functionality of all software used by Power, and Power's attempts to integrate the Power website with Facebook using Facebook Connect. |
| 21 | | | |
| 22 | | | |
| 23 | | | |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | | | |

| | | | |
|----|------------------|--|--|
| 1 | Ed Niehaus | Collaborative Drug Discovery, Inc., 1633 Bayshore Hwy., Suite 342, Burlingame, CA 94010 (650) 259-9512 | Information regarding Power's access to and use of the Facebook website, including the creation of Power, communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, and communications with investors. |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | Boyan Josic | Unknown | Information regarding Power's access to and use of the Facebook website, including the creation and operation of Power, communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, and communications with investors. |
| 8 | | | |
| 9 | | | |
| 10 | | | |
| 11 | | | |
| 12 | | | |
| 13 | Igor Barenboim | Treasury Department, Itau BBA 4 Beckwith Cir., Apt. 2, Somerville, MA Phone Number Unknown | Information regarding Power's access to and use of the Facebook website, including the creation and operation of Power, communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, and communications with investors. |
| 14 | | | |
| 15 | | | |
| 16 | | | |
| 17 | | | |
| 18 | | | |
| 19 | Michael Ross | Joseph Capital LLC, 501 Fifth Ave., 16th Floor, New York, NY 10017, (212) 875-1500 | Information regarding Power's access to and use of the Facebook website, including the creation and operation of Power, communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, and communications with investors. |
| 20 | | | |
| 21 | | | |
| 22 | | | |
| 23 | | | |
| 24 | | | |
| 25 | Cornelius Conboy | CrossFarma Address and telephone number unknown | Information regarding Power's access to and use of the Facebook website, including the creation and operation of Power, communications with Facebook concerning Power's access to Facebook, |
| 26 | | | |
| 27 | | | |
| 28 | | | |

| | | | |
|----|----------------------|---|--|
| 1 | | | communications with other social networks, communications with the Press, and communications with investors. |
| 2 | | | |
| 3 | | | |
| 4 | Cleomar Rocha | Unknown | Information regarding Power's access to and use of the Facebook website, including the creation and operation of Power, communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, and communications with investors. |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| 9 | | | |
| 10 | Ron Pollock | 46A Mariposa Ct., Unit A, Danville, CA, 94526, (925) 743-1078; (925) 997-5755 | Information regarding Power's access to and use of the Facebook website, including the creation and operation of Power, communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, and communications with investors. |
| 11 | | | |
| 12 | | | |
| 13 | | | |
| 14 | | | |
| 15 | | | |
| 16 | Andreas Stavropoulos | Draper Fisher Jurvetson 2882 Sand Hill Road, Suites 150 and 210 Menlo Park, CA 94025 P: 650-233-9000 | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 17 | | | |
| 18 | | | |
| 19 | | | |
| 20 | | | |
| 21 | | | |
| 22 | Simon Olson | Draper Fisher Jurvetson 2882 Sand Hill Road, Suites 150 and 210 Menlo Park, CA 94025 P: 650-233-9000 | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 23 | | | |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | | | |

| | | | |
|----|-------------------|---|--|
| 1 | Esther Dyson | EDventure Holdings 632 Broadway, Fl. 10, New York, NY 10012, (917) 443- 2788 | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | Myles Weissledder | mylermedia 415 Pine St. #6c, Sausalito, CA 94965, (415) 843-1850; (415) 332-4423 | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, and communications with investors. |
| 9 | | | |
| 10 | | | |
| 11 | | | |
| 12 | | | |
| 13 | Leigh Power | Unknown | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 14 | | | |
| 15 | | | |
| 16 | | | |
| 17 | | | |
| 18 | | | |
| 19 | | | |
| 20 | Chris Matchett | Unknown | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 21 | | | |
| 22 | | | |
| 23 | | | |
| 24 | | | |
| 25 | | | |
| 26 | Neil Azous | Navigate Advisors | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's |
| 27 | | | |
| 28 | | | |

| | | | |
|----|--|---|--|
| 1 | | | access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | Omar Amanat | Amanat Capital | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| 9 | | | |
| 10 | | | |
| 11 | | | |
| 12 | Attorneys at Skadden, Arps, Slate, Meagher & Flom LLP, including Henna Ahmad | 525 University Avenue Suite 1100 Palo Alto, California 94301 (650) 470-4500 Four Times Square New York, New York 10036 (212) 735-3000 | Information regarding Power's formation, and information regarding Power's legal review of social networks' Terms of Service and basis for concluding Power could access sites in prohibition of conditions set forth in Terms of service. |
| 13 | | | |
| 14 | | | |
| 15 | | | |
| 16 | Seth Sternberg and others at Meebo | Meebo 215 Castro Street Mountain View, CA 94041 (650) 237-3130 | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 17 | | | |
| 18 | | | |
| 19 | | | |
| 20 | | | |
| 21 | | | |
| 22 | | | |
| 23 | Individuals at Digsby | Unknown. As of April, 2011, Digsby was acquired by Tagged Inc. 110 Pacific Ave Mail Box #117 San Francisco CA 94111 | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | | | |

| | | | |
|----|------------------|---|--|
| 1 | | | Power. |
| 2 | Ryan McGeehan | Should be contacted only through Orrick, Herrington & Sutcliffe. | Mr. McGeehan is a member of Facebook's security incident response team. Mr. McGeehan has personal knowledge of Facebook's investigation and response upon learning of Power's access and use of the Facebook website. |
| 3 | | | |
| 4 | | | |
| 5 | Joseph P. Cutler | Perkins Coie 1201 Third Avenue Suite 4800 Seattle, WA 98101-3099 | Information regarding communications with Steve Vachani |
| 6 | | | |
| 7 | Roy Schwartz | 15255 Delgado Drive Sherman Oaks CA 91403 | Information regarding Power's access to and use of the Facebook website, including the creation of Power, communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, and communications with investors. |
| 8 | | | |
| 9 | | | |
| 10 | | | |
| 11 | | | |
| 12 | | | |
| 13 | | | |
| 14 | | | |
| 15 | Laurence Briggs | | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 16 | | | |
| 17 | | | |
| 18 | | | |
| 19 | | | |
| 20 | | | |
| 21 | | | |
| 22 | Bob Harvey | | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of |
| 23 | | | |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | | | |

| | | | |
|----|----------------|--|--------------------------------|
| 1 | | | Power, and the value of Power. |
| 2 | De Amma Davies | | Information regarding Power's |
| 3 | | | access to and use of the |
| 4 | | | Facebook website, including |
| 5 | | | communications with |
| 6 | | | Facebook concerning Power's |
| 7 | | | access to Facebook, |
| 8 | | | communications with other |
| 9 | | | social networks, |
| 10 | Robert Feeback | | communications with the |
| 11 | | | Press, communications with |
| 12 | | | investors, the creation of |
| 13 | | | Power, and the value of |
| 14 | | | Power. |
| 15 | | | Information regarding Power's |
| 16 | | | access to and use of the |
| 17 | | | Facebook website, including |
| 18 | | | communications with |
| 19 | | | Facebook concerning Power's |
| 20 | | | access to Facebook, |
| 21 | | | communications with other |
| 22 | | | social networks, |
| 23 | | | communications with the |
| 24 | | | Press, communications with |
| 25 | John Miller | | investors, the creation of |
| 26 | | | Power, and the value of |
| 27 | | | Power. |
| 28 | | | Information regarding Power's |
| | Jesse Hibbard | | access to and use of the |
| | | | Facebook website, including |
| | | | communications with |
| | | | Facebook concerning Power's |
| | | | access to Facebook, |

| | | | |
|----|----------------------|--|--|
| 1 | | | communications with other social networks, |
| 2 | | | communications with the Press, communications with |
| 3 | | | investors, the creation of Power, and the value of |
| 4 | | | Power. |
| 5 | Abbas Poonawala | | Information regarding Power's access to and use of the |
| 6 | | | Facebook website, including |
| 7 | | | communications with Facebook concerning Power's |
| 8 | | | access to Facebook, |
| 9 | | | communications with other social networks, |
| 10 | | | communications with the Press, communications with |
| 11 | | | investors, the creation of Power, and the value of |
| 12 | | | Power. |
| 13 | Garland Braithewaite | | Information regarding Power's access to and use of the |
| 14 | | | Facebook website, including |
| 15 | | | communications with Facebook concerning Power's |
| 16 | | | access to Facebook, |
| 17 | | | communications with other social networks, |
| 18 | | | communications with the Press, communications with |
| 19 | | | investors, the creation of Power, and the value of |
| 20 | Kelly Harris | | Power. |
| 21 | | | Information regarding Power's access to and use of the |
| 22 | | | Facebook website, including |
| 23 | | | communications with Facebook concerning Power's |
| 24 | | | access to Facebook, |
| 25 | | | communications with other social networks, |
| 26 | | | communications with the Press, communications with |
| 27 | | | investors, the creation of Power, and the value of |
| 28 | | | Power. |

| | | |
|---|--|--|
| 1 John Antos | | Information regarding Power's access to and use of the Facebook website, including communications with Facebook concerning Power's access to Facebook, communications with other social networks, communications with the Press, communications with investors, the creation of Power, and the value of Power. |
| 2 | | |
| 3 | | |
| 4 | | |
| 5 | | |
| 6 | | |
| 7 | | |
| 8 | | |
| 9 TransPerfect Translations | 160 Spear St. #1100 San Francisco, CA 94105 (415) 615-9191 | This service may be used by Facebook to translate relevant Portuguese documents and/or testimony. |
| 10 | | |
| 11 Witnesses Listed in the Rule 26 Disclosure(s) of Power Ventures, Inc. and/or Steve Vachani | Unknown | All topics identified in the Rule 26 Disclosure(s) of Power Ventures, Inc. and/or Steve Vachani |
| 12 | | |
| 13 | | |

14 To the extent that Facebook obtains knowledge identifying additional individuals who
15 may have knowledge regarding factual matters relevant to the case, Facebook will disclose them
16 as required by the Federal Rules of Civil Procedure and the Local Rules of the Court. By listing
17 the individuals above, Facebook does not waive its right to object to any discovery requests or
18 deposition notices concerning any individuals listed herein.

19 **Rule 26(a)(1)(A)(ii): a copy—or a description by category and location—of all**
20 **documents, electronically stored information, and tangible things that the disclosing**
21 **party has in its possession, custody, or control and may use to support its claims or**
22 **defenses, unless the use would be solely for impeachment.**

23 Facebook identifies the following categories of documents that it may use to support its
24 claims, if such documents exist.

- 25 1. Documents related to Power's knowledge of technical measures implemented by
Facebook to block Power and its users from accessing Facebook;
- 26 2. Documents related to Power's circumvention of the technical measures
27 implemented by Facebook to block Power and its users from accessing Facebook;
- 28 3. Documents related to Power's misuse of the Facebook's services;

1 4. Documents related to the damages and losses incurred by Facebook as a result of
2 Power's conduct;

3 5. Facebook's terms and policies.

4 The foregoing categories do not constitute an admission by Facebook that documents
5 within the specified categories exist or that they are within its possession, custody, or control. In
6 addition, documents and things in other categories not presently known to Facebook may contain
7 information that it may use to support its claims. Facebook reserves the right to supplement the
8 categories of documents as more information becomes available through the discovery process
9 pursuant to the supplementation procedures under the Federal Rules of civil Procedure, consistent
10 with any applicable protective orders or other Court orders. Nothing in this Initial Disclosure
11 should be interpreted to limit Facebook's ability to provide such information at the times
12 specified by the Federal Rules of Civil Procedure, Local Rules or by Court order. Facebook
13 reserves its right to object to the production of any document, data compilations or tangible things
14 within the categories described herein on any basis permitted by the Federal Rules of Civil
15 Procedure, including but not limited to the attorney-client privilege and the work-product
16 doctrine.

17 **Rule 26(a)(1)(A)(iii): a computation of each category of damages claimed by the**
18 **disclosing party—who must also make available for inspection and copying as under**
19 **Rule 34 the documents or other evidentiary material, unless privileged or protected**
20 **from disclosure, to which each computation is based, including materials bearing on**
21 **the nature and extent of injuries suffered.**

22 Facebook is still in the process of quantifying and calculating the damages that it has
23 sustained as a result of Power's and Vachani's violation of California Penal Code Section 502,
24 the Computer Fraud and Abuse Act and the CAN-SPAM Act. Such damages include, however,
25 Facebook's costs associated with identifying and remedying Power's and Vachani's misuse of
26 Facebook's services, circumvention of Facebook's technical measures to prevent such misuse, the
27 value represented by the loss of advertisers and/or members as a result of Power's and Vachani's
28 tortious acts, and statutory damages pursuant to the CAN-SPAM Act.

Rule 26(a)(1)(A)(iv): for inspection and copying as under Rule 34, any insurance
 agreement under which an insurance business may be liable to satisfy all or part of a

FACEBOOK'S SECOND SUPPLEMENTAL INITIAL
DISCLOSURES
5:08-cv-05780 JW (JCS)

DECLARATION OF SERVICE

I am more than eighteen years old and not a party to this action. My business address is Orrick, Herrington & Sutcliffe LLP, 1000 Marsh Road, Menlo Park, CA 94025.

On October 14, 2011, I served the following document(s):

1. FACEBOOK, INC.'S SECOND SUPPLEMENTAL INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26.

| | |
|----------|--|
| X | By transmitting via electronic mail the document(s) listed above to the email addresses(s) set forth below before 12:00 a.m. Midnight on October 14, 2011. |
|----------|--|

Scott A. Bursor, Esq. (*admitted pro hac vice*)
scott@bursor.com
BURSOR & FISHER, P.A.
 369 Lexington Avenue, 10th Floor
 New York, NY 10017-6531
 Tel: 212-989-9113
 Fax: 212-989-9163

L. Timothy Fisher, Esq.
ltfisher@bursor.com
BURSOR & FISHER, P.A.
 2121 North California Blvd., Suite 1010
 Walnut Creek, CA 94596
 Tel: 925-482-1515
 Fax: 925-407-2700

**COUNSEL FOR DEFENDANTS
 POWER VENTURES, INC. AND STEVE VACHANI**

I am readily familiar with my firm's practice for collection and processing correspondence for electronic transmission, to wit, that correspondence be electronically transmitted this same day in the ordinary course of business.

Executed on January 13, 2012 at Menlo Park, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

/s/ Morvarid Metanat

Morvarid Metanat